

BILL OF COSTS APPENDIX

FEES FOR COURT REPORTER SERVICES

Video Production Services for the deposition of Teresa Banks	\$1,125.28
Michelle E. C. Hinson – Deposition of Teresa Banks	\$2,355.75
TOTAL	\$3,481.03

FEES FOR COPIES NECESSARILY OBTAINED

Medical Records from Cynthia L. Wallace Family Practice	\$10.00
Medical Records from Premier Orthopaedics	\$16.25
TOTAL	\$26.25

FEES FOR COPIES

Pleading	No. of pgs x No. copies x .13 per pg	Total Cost
Defendant's Answer and Counter Claim	12 x 2 x .13	3.12
Defendant's Initial Disclosures	3 x 2 x .13	.78
Defendant's First Set of Interrogatories to Plaintiff	20 x 2 x .13	5.20
Defendant's First Set of Requests for Production of Documents	7 x 2 x .13	1.82
Psychotherapy HIPAA Authorization	1 x 2 x .13	.26
General HIPAA Authorization	1 x 2 x .13	.26
Defendant/ Counter Plaintiff's Response to Plaintiff/ Counter Defendant's Motion to Dismiss	4 x 2 x .13	1.04
Defendant's Response to Plaintiff's First Set of Interrogatories and Requests for Production of Documents to Defendant	29 x 2 x .13	7.54
Document Production	1329 x 2 x .13	345.54
Notice of Rule 30 (b)(6) Deposition	5 x 2 x .13	1.30
Defendant's Notice of Deposition of Teresa Banks	2 x 2 x .13	.52
Plaintiff's Motion and Memorandum In Support of Motion to Quash Subpoenas and /or for a Protective Order and for Expedited Hearing.	10 x 2 x .13	2.60
Defendant's Response in Opposition To Plaintiff's Motion to Quash Subpoenas and/or For a Protective Order	48 x 2 x .13	12.48
Notice of Resolution of Discovery Dispute and Withdraw of Plaintiff's Motion to Quash/ For Protective Order	2 x 2 x .13	.52

EXHIBIT A

Motion to Exclude Testimony of Catina Beard	24 x 2 x .13	6.24
Declaration of Ivan Gunn	9x 2 x .13	2.34
Declaration of Annette Smith	3 x 2 x .13	.78
Declaration of Todd Larry	7 x 2 x .13	1.82
Defendant's Motion for Summary Judgment	3 x 2 x .13	4.68
Defendant's Memorandum in Support of its Motion For Summary Judgment	26 x 2 x .13	6.76
Defendant's Statement of Undisputed Material Facts	10 x 2 x .13	2.60
Defendant's Reply in Support of Summary Judgment	21 x 2 x .13	5.46
Defendant's Objection to Plaintiff's Response to Defendant's Statement of Undisputed Facts and Response to Plaintiff's Additional Statement of Disputed Facts For Trial	18 x 2 x .13	4.68
Defendant's Motion in Limine to Exclude Evidence Regarding Plaintiff's Allegation that Argos Defamed Her and Inhibited Her Ability to Gain Employment	10 x 2 x .13	2.60
Defendant's Motion in Limine to Exclude Evidence Regarding Unemployment Benefits Determination	9 x 2 x .13	2.34
Defendant's Motion in Limine to Exclude Evidence Regarding Alleged Shifting/ Changing Reasons for Plaintiff's Termination	9 x 2 x .13	2.34
Defendant's Motion in Limine to Exclude Evidence Regarding the Potential Settlement of Plaintiff's Workers' Compensation Claim	9 x 2 x .13	2.34
Defendant's Motion In Limine to Exclude Evidence Regarding Untimely Theory or Liability Raised by Plaintiff	6 x 2 x .13	1.56
Defendant's Motion In Limine to Exclude Evidence Referring to a Report of a Work Related Injury By an Employee Other Than Plaintiff	9 x 2 x .13	2.34
Defendant's Motion In Limine to Exclude Use of Phrase "Dead Woman Walking" at Trial	7 x 2 x .13	1.82
Defendant's Motion In Limine to Exclude Evidence referring to Workers' Compensation Claim Position Statement	8 x 2 x .13	2.08
Defendant's Motion In Limine to Exclude Evidence Regarding Plaintiff's Performance Evaluation	9 x 2 x .13	2.34
Defendant's Motion in Limine to Exclude Reference to Plaintiff's Workers' Compensation Sworn Interview As An Interrogation.	8 x 2 x .13	2.08
Defendant's Exhibit List	3 x 2 x .13	.78

EXHIBIT A

Defendant's Witness List	2 x 2 x .13	.52
Defendant's Damages Brief	12 x 2 x .13	3.12
Defendant's Proposed Jury Instructions	23 x 2 x .13	5.98
Defendant's Proposed Verdict Form	3 x 2 x .13	.78
TOTAL		451.36
GRAND TOTAL		\$3,958.64

EXHIBIT A



COPY
RECEIVED

JUL 02 2013

NASHVILLE

SOLD TO:
Ms. Mary Dohner Smith
CONSTANGY, BROOKS & SMITH, LLP
Suite 700
401 Commerce Street
Nashville, TN 37219

INVOICE #
7267
DATE
2/6/13

Marcus Lackey d/b/a Video Production Services
Taxpayer ID# 302-56-9361

TERMS: NET 30 DAYS

Case: Banks v. Argos Risk Mgt.
Audio/video recording the deposition of: Ms. Teresa Banks, 401 Commerce Street, Nashville, TN.
1/30/13, 10:14 AM - 5:41 PM, 7.5 hours total.

First hour		\$200.00
Second hour		\$150.00
Additional hours (5.5)	\$80	\$440.00
Duplication of above to DVD-Video disc, two copies of each of four original recordings		
Archive duplicate disc (4)	\$40	\$160.00
Additional duplicate disc (4)	\$20	\$80.00
Hand delivery within Davidson County		<u>n/c</u>
Sub Total		\$1,030.00
Sales Tax		<u>\$95.28</u>
Total Due		\$1,125.28

DVD-video archive duplicate (1 set of 4) held by VPS pending further instructions. DVD-video duplicates (1 set of 4) delivered to Ms. Smith 2/6/13, via hand delivery.

Thank You!

MICHELLE E.C. HINSON, LCR
1129 Riverwood Drive
Nashville, TN 37216-2227

(615)870-8902
michinson33@gmail.com

fwd to AH on 2/28

COPY

Invoice

Date	Invoice #
02/18/2013	1113
Terms	Due Date
Net 30	03/20/2013

Bill To

MARY DOHNER SMITH ESQ.
Constangy, Brooks & SMith
401 Commerce Street, Ste. 700
SunTrust Plaza
Nashville, TN 37219

RECEIVED

FEB 18 2013

NASHVILLE

Amount Due	Enclosed
\$2,355.75	

Please detach top portion and return with your payment.

Date	Activity	Amount
01/30/2013	Bank v. Argos USDC No.: 3:12-cv-0596 Videotaped deposition of Teresa Banks Attendance fee	375.00
02/18/2013	Transcript fee (Banks original)	1,116.50
02/18/2013	Transcript fee (Peine copy)	864.25
Total		\$2,355.75

Thank you for your business!
EIN: 45-3727632

Robert W. Guth, M.D. & Cynthia L. Wallace, M.D.

FAMILY PRACTICE

4777 Andrew Jackson Pkwy. Suite 101

Hermitage, TN 37076

615-889-7010

F: 615-889-0135

To Whom It May Concern:

Our office is in receipt of a medical records request for Teresa Banks. Based on Tennessee Code annotated the rules and regulations for collecting payment for medical records is as follows: \$20.00 for the first 40 pages and \$.25 for each page thereafter, including the actual cost of mailing. Therefore payment in the amount of \$ 10.⁰⁰ is required for the records to be mailed. We do not fax records. If you have any questions or concerns, please feel free to contact our office.

Thank you in advance,

Michelle Formato

Michelle Formato

Medical Records

615-889-7010 ext. 232

Note: We only accept payment by check. Please make checks payable to the doctor from which records are requested.

Tax Id #'s: Dr. Robert Guth 621344450

Dr. Cynthia Wallace 621776893



PREMIER ORTHOPAEDICS
& SPORTS MEDICINE, PLC

Administrative Offices

1321 Murfreesboro Road
Suite 510
Nashville, TN 37217
Admin. Tele. (615) 366-1177
Business Tele. (615) 366-8890
Toll Free (800) 323-8858
Fax (615) 366-3379
www.premier-ortho.com

Paul A. Abbey, M.D.
L. Brett Babat, M.D.
Malcom E. Baxter, M.D.
Daniel J. Burval, M.D.
Joseph D. Chenger, M.D.
Wesley L. Coker, M.D.
Robert M. Dimick, M.D.
Brandon H. Downs, M.D.
James W. Eby, M.D.
James M. Fish, D.O.
Jason K. Haslam, M.D.
William J. Jekot, M.D.
Sean B. Kaminsky, M.D.
Melvin D. Law, Jr., M.D.
Jeffrey P. Lawrence, M.D.
Robert W. Lowe III, M.D.
William C. Mayfield, III, M.D.
Daniel J. McHugh, M.D.
Steven G. McLaughlin, M.D.
Gregg A. Motz, M.D.
Vincent P. Novak, M.D.
Roger N. Passmore, M.D.
V. Douglas Pierce, Jr., M.D.
Michael L. Reid, M.D.
R. James Renfro, Jr., M.D.
Steve G. Salyers, M.D.
Marc A. Tressler, D.O.
Joseph A. Wieck, M.D.

INVOICE

Date: 02/21/2013

To: CONSTANGY, BROOKS, AND SMITH
401 COMMERCE STREET
NASHVILLE, TN 37219

Telephone: 615-320-5200

Fax: 615-321-5891

We are in receipt of your request for:

- ☐ Medical Records (**NOT** workers' compensation) @ \$20.00 for the first 5 pages and \$0.50 for each additional page. Page count =
- ☒ Medical Records (workers' compensation) @ \$10.00 for the first 20 pages and \$0.25 for each additional page. Page count = 45 PGS
- ☐ Itemized Statement (included in page count when requested with medical records), otherwise \$5.00 for the first 10 pages \$0.25 for each additional.
- ☐ Customized Itemized Account Info (Request for specified dates of service, when computer generated statement of account is not acceptable) \$20.00-\$50.
- ☐ Image Copies on CD \$5.00 per CD
- ☐ Impairment rating (**NOT** workers' compensation)
- ☐ Affidavit \$20.00
- ☐ Misc Service

Total Amount Due = \$ 16.25

Patient Name: TERESA BANKS 01/18/1954

Account # 545709

Dr. BAXTER

Please note that our office policy requires these fees be prepaid. Invoice will void after 60 days if not paid with the exception of subpoenaed records. Payments and future correspondence should be sent to:

Judy Bobbitt, Medical Records Department Manager
PREMIER ORTHOPAEDICS & SPORTS MEDICINE, PLC
1321 Murfreesboro Road, Suite 510
Nashville, TN 37217
Tax ID# 62-1619606

Please address questions to Julie Collier by telephone at (615) 366-7015 or by fax at (615) 366-2264. Thank you.